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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**JOSHUA M. WARNER,  
aka EVA WARNER,**

**Defendant.**

**Case No. 3:20-cr-00442-HZ**

**UNOPPOSED MOTION TO  
CONTINUE TRIAL AND  
WITHDRAW MOTION TO  
DISMISS (ECF 16)**

NOW COMES Eva Warner, through her attorney, Gerald M. Needham, and moves to continue the presently scheduled trial date of April 27, 2021, to December 22, 2021, or a date thereafter convenient to the Court. The reasons for the motion are more fully amplified in the accompanying Declaration of Counsel. This motion is unopposed by the government.

Ms. Warner acknowledges and understands that the timeframe of the continuance is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

Assistant United States Attorney Tom Ratcliffe has authorized counsel to represent the government has no objection to the requested continuance.

Based on the aforementioned and the accompanying Declaration of Counsel, defendant moves to continue the trial of April 27, 2021, to December 21, 2021, or a date thereafter convenient to the Court. The timeframe of the requested continuance is excludable from Speedy Trial computations pursuant to 18 U.S.C. § 3161(h)(7)(A), as the ends of justice served by the granting of the continuance outweigh the interests of the public and the defendant in a speedier trial.

Respectfully submitted on March 22, 2021.

/s/ Gerald M. Needham

Gerald M. Needham

Assistant Federal Public Defender